



SOLVAY CHEMICALS

INTEROX, FLUORIDES & MINERALS

January 5, 2006

Mike Stoll
WDDQ-Air Quality Division
122 W. 25th Street
Cheyenne, WY 82002

RE: Revised CO Minimization Plan for MD-995

Dear Mike:

Enclosed you will find a revised CO Minimization Plan to address the conversion of Calciners "A" and "B" (AQD #17) to coal-firing per MD-995. The Plan will remain in effect for Calciners "C" (AQD #48) and "D" (AQD #80), which are gas-fired.

Please include this revision into Operating Permit 30-126-1.

Certification by the Responsible Official, Ronald O. Hughes is included.

If you have any questions, please contact me at (307) 872-6571.

Respectfully submitted,

Dolly A. Potter

cc: Tony Hoyt

Enclosure



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SOLVAY2016_1.3_000728



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INTEROX, FLUORIDES & MINERALS

Revision of CO Minimization Plan for MD-995

"I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this report are true, accurate, and complete."

Name: Ronald O. Hughes

Signature: *R. H.*

Title: General Manager

Date: 1/5/06



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Solvay Chemicals

Permit #30-126-1

PROCEDURE FOR MINIMIZATION OF CO EMISSIONS FROM CALCINER BURNER

(Updated January 2006)

The natural-gas burners on Calciners "C" (AQD #48) and "D" (AQD #80) are designed to produce low emission through pre-mixing of air and fuel. Control of the air-to-fuel ratio is important in operating the burners such that CO emissions are minimized.

The air-to-fuel ratio is controlled by the Distributive Control System (DCS), based on continuously measured air flow, fuel flow, and heating value of the fuel.

The burners are normally operated with an air ratio of 130% to 180% of stoichiometric air. Air ratios lower than this could result in increased emissions. The DCS shuts down a burner if its air ratio falls to 130% or lower. (Trip points may be set higher than 130% for process reasons not related to CO emissions. This higher trip point will still insure compliance with this Procedure.)

These air ratios are historized from the DCS to the Plant Historian and archived for five years.

Upon conversion of Calciners "A" and "B" (common stack AQD #17) to coal-firing per MD-995, this procedure will no longer apply to those units.